

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Allianz Global Investors GmbH, et al.,

Plaintiffs,

-against-

Bank of America Corporation, et al.,

Defendants.

Case No.: 1:18-cv-10364

**~~PROPOSED~~ ORDER GRANTING UNOPPOSED MOTION FOR ISSUANCE OF A
HAGUE CONVENTION REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE
TO TAKE TESTIMONY OVERSEAS**

The Court, having reviewed Plaintiffs' Unopposed Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas as well as papers in support and opposition, HEREBY ORDERS THAT:

1. The Motion is GRANTED.
2. The Request for Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters attached as Exhibit A to this order, is hereby issued as the Court's "Letter of Request" and is fully incorporated herein.
3. The signed Order and the Letter of Request will be given to Quinn Emanuel Urquhart & Sullivan, LLP, who will cause both documents to be filed with the Ministere de la Justice, Direction des Affaires Civiles et du Sceau, Departement de l'entraide, du droit international prive et europeen, 13, Place Vendome, 75042 Paris Cedex 01, France.
4. The Stipulation and Order of Confidentiality (ECF No. 157) in this action shall apply to the deposition, including the transcript and video.

5. This Order, the deposition of Serge Sarramegna or the terms of the Letter of Request (which are incorporated into this Order) shall not be construed or operate as a waiver of any argument, position, objection, allegation, or claim or defense of any party in the above-captioned action, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of France, the United States of America, or the State of New York.

IT IS SO ORDERED.

DATED: 4/5/2022

A handwritten signature in blue ink, appearing to read "Stewart D. Aaron", is written above a horizontal line.

THE HONORABLE STEWART D. AARON
UNITED STATES MAGISTRATE JUDGE